

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FT. WORTH DIVISION

FILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FT. WORTH DIVISION

2014 MAY 14 PM 2:17

CLERK OF COURT

UNITED STATES OF AMERICA

NO.

v.

BRICE JOHNSON

4- 14 CR- 108- 0

The Grand Jury Charges:

INDICTMENT

Count One

Hate Crime

(18 U.S.C. § 249(a)(2))

On or about September 2, 2013, in the Fort Worth Division of the Northern District of Texas, and elsewhere, **Brice Johnson**, the defendant, willfully caused bodily injury to A.K., who is gay, because of A.K.'s actual and perceived sexual orientation. In connection with the offense conduct, which included kidnapping, the defendant used a channel, facility and instrumentality of interstate commerce, to wit: a cellular phone, a website based cellular phone application ("app"), the internet and a Ford Fusion motor vehicle.

In violation of 18 U.S.C. § 249(a)(2).

Count Two
Kidnapping
(18 U.S.C. § 1201(a)(1))

On or about September 2, 2013, in the Fort Worth Division of the Northern District of Texas, and elsewhere, **Brice Johnson**, the defendant, willfully and unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away A.K., and held A.K., for some purpose and benefit, and used a means, facility and instrumentality of interstate commerce, to wit: a cellular phone, a website based cellular phone application ("app"), the internet and a Ford Fusion motor vehicle, in committing and in furtherance of the commission of the offense.


In violation of 18 U.S.C. § 1201(a)(1).


A TRUE BILL


FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY

JOCELYN SAMUELS
ACTING ASST. ATTORNEY GENERAL
CIVIL RIGHTS DIVISION


CARA FOOS PIERCE
Assistant United States Attorney
Texas State Bar No. 24036579
110 Commerce Street, Suite 300
Dallas, Texas 75242-1699
Telephone: 214-659-8678
Facsimile: 214-659-8803


SAEED A. MODRY *wipby/crf*
Trial Attorney
New York State Bar No. 4368080
601 D Street NW, Suite 5200
Washington, DC 20004
Telephone: 202-514-5107
Facsimile: 202-514-8336

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THE UNITED STATES OF AMERICA

VS.

BRICE JOHNSON

INDICTMENT

18 U.S.C. § 249(a)(2)
Hate Crime

18 U.S.C. § 1201(a)(1)
Kidnapping

(2 COUNTS)

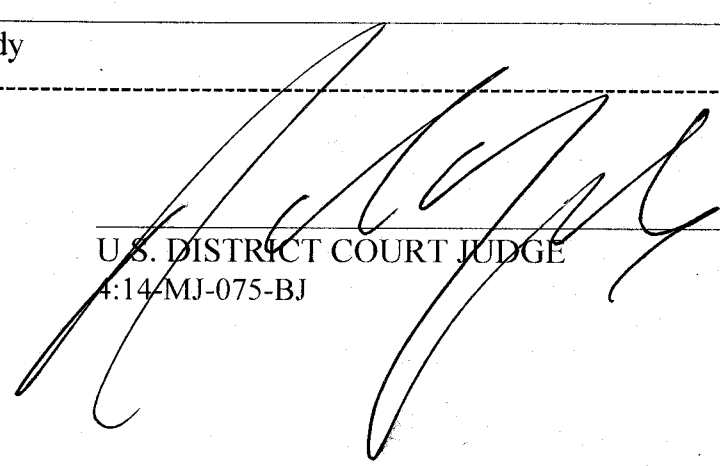
A true bill rendered:

FORT WORTH

 FOREPERSON

Filed in open court this 14th day of May, A.D. 2014.

Custody status: In Federal Custody


U.S. DISTRICT COURT JUDGE
4:14-MJ-075-BJ